All Program, Budget, Acquisition, and Finance Office staff will use the following policy and guidance when formally engaged in doing business with other Federal Government Agencies. This policy and guidance is applicable when BLM is receiving good or services FROM another Federal Agency (BLM is the Buyer) and when BLM is providing goods or services TO another Federal Agency (BLM is the Seller).

The guidance in this IM does not apply to:

- 1. Memorandums of Understanding (MOU's) and Memorandums of Agreement (MOA's)
- 2. Use of the Government Purchase Card and Convenience Checks
- 3. National Emergencies
- 4. National Security Considerations

Federal Agencies who engage in business with other Federal Agencies to obtain a Dun & Bradstreet Number (DUNS) and register on the federal government's Business Partner Network (BPN) at http://www.bpn.gov. All BLM State Offices, the National Centers and the Washington Office were initially registered on BPN to meet the OMB deadline of January 31, 2003. Registration at the Field Office level is not required at this time. Refer to instructions below; for Buyer refer to paragraph I. C. and for Seller refer to paragraph II. A. Federal Agencies are required to update their registration annually. Each State Office, Center and Washington Office will designate a single point of contact (POC) responsible for updating their registration information. POC designations will be submitted and coordinated with Dave Wunder, National Business Center, 303-236-9424.

Access to Federal Agency registration data by BLM Program Offices, Acquisition, Finance and Budget Office staff will be necessary to engage in business and process Intra-governmental Orders (IGO's) with other Department of Interior (DOI) Bureaus and other Federal Agencies. Federal Agency Registration data can be accessed by going to the website @ http://www.bpn.gov. Click on Federal Agency Registration, and then click on Search Only (Search the Site).

<u>Processing Intra-governmental Orders (IGO's) at the State Office, National Centers and Washington Office level is encouraged and recommended for implementing the OMB eliminations process</u>. Field Offices may initiate IGO's provided the State Office registration data is used to process these transactions.

The following guidance describes the roles and responsibilities for Program, Budget, Acquisition and Finance Officials as categorized by the Buyer and Seller function.

Definitions:

<u>Program Offices</u> – any office within BLM (Field or District Office, State Office, National Center or Washington Office) who submits a request to the acquisition office for the purchase of goods or services. Also, any office within the BLM who provides goods or services to another Federal Agency.

<u>Line Managers</u> - Those individuals within the Program Office who are authorized and directly responsible for managing the budget. They are responsible for approving Purchase Requests when BLM is the Buyer and they are responsible for signing IGO's when BLM is the Seller.

<u>Budget Offices</u> - Representatives within the Program Office designated with the roles and responsibility of advising and assisting Line Managers with budget issues. Responsible for Reviewing and approving purchase requests when BLM is the requesting agency.

<u>Acquisition Offices</u> – Warranted Contracting Officers (CO) with the authority to award IGO's.

- **I.** Buyer (Requesting Agency) Responsibilities— The following procedures will be followed by Program, Budget, Acquisition, and Finance Office staff when BLM is requesting goods or services to be furnished by another Federal Agency.
 - A. All Program Offices A Purchase Request (PR) will be prepared using the Interior Department Electronic Acquisition System-Procurement Desktop (IDEAS-PD) to identify the goods or services to be provided by the other Federal Agency. Upon IDEAS approval by a Budget representative and Supervisor, the PR will be routed to the appropriate Acquisition office. Other approvals (e.g. Information Technology, Property Management) must also be obtained if they are applicable before the PR is routed to the Acquisition Office.

Program Office Officials are responsible for the following:

Note: When BLM is the Buyer (Requesting Agency), no work is to begin by the Seller (Servicing Agency) until a signed IGO is in place and signed by the Buyer (a warranted Contracting Officer of the BLM) and seller (Servicing Agency).

Note: When BLM pays for an employee from another Agency to Travel or BLM gives an employee from another agency an award, an IGO must be established.

1. Prepare the Intra-governmental Order (IGO) Articles which identify the services, terms and conditions with the Servicing Agency. Program officials will save the IGO Articles as an attachment to the PR in IDEAS. A template for creating the IGO Articles is available in IDEAS under the menu Procurement>Attachment. A

- hard copy of the IGO Articles is provided as Attachment 2 under the issuing Instruction Memorandum (IM), subject: Intra-governmental Transactions (IGT).
- 2. Determine the appropriate subactivity to charge. Coordination with Line Managers is required as they are responsible for managing their budget. If applicable, request reservation of funds for the agreement by coordinating the PR with the appropriate budget or finance official to post the PR as a commitment in the Federal Finance System (FFS).
- 3. Assist the CO to negotiate the terms of the agreement with the Servicing Agency.
- 4. Prepare a justification for entering into the IGO with another Federal Agency. The justification must cite the legal authority (e.g. Economy Act, Clinger-Cohen Act, Government-wide User Charge, Inter-governmental Cooperation Act, or other specific statutory authority) that authorizes the action and the rationale for why it is advantageous to enter into the agreement. The justification will be prepared as an attachment and saved with the PR. A template for creating the justification is available in IDEAS under the menu Procurement>Attachment.
- 5. Notify the CO within 3 business days after the items or services have been delivered by the Servicing Agency.
- **B. Budget Offices** An appropriate budget office representative is responsible for reviewing and approving PR's that are routed to them in IDEAS. Budget representatives are responsible for reviewing the accuracy of funding codes with regard to validation of subactivity, program element, project number (if applicable) and budget object class as determined to be applicable by the Line Manager and certifying availability of funds exist at the time the PR is being approved. A Budget Office approval will be applied to the PR prior to being routed to the responsible supervisor and Acquisition office for award.
- **C. All Acquisition Offices** Upon receipt of a fully approved PR, Acquisition staff are responsible for the following processes:
- 1. Coordinate with the responsible Program Office to prepare a justification for the acquisition file that identifies the legal authority (e.g. Clinger-Cohen Act, Intergovernmental Cooperation Act, or Economy Act) for entering into the IGO. A hard copy of the justification will be placed in the acquisition folder for future reference. Authority for entering into IGO's exceeding \$500,000 using the Economy Act must be reviewed by the solicitor's office and approved by the Bureau Procurement Chief in the BLM Washington Office (WO) Property, Acquisition, and Headquarters Services Group (WO-850).
- 2. Unless exempt, the CO is responsible for compliance with FAR Subpart 7.3 Contractor vs. Government Performance and OMB Circular A-76. A hard copy of the analysis will be placed in the Acquisition folder for future reference.
- 3. Negotiate the IGO Articles (terms and conditions) with the Servicing Agency (Seller). In particular, the billing terms should be clearly identified (e.g., monthly, quarterly, semi-annually or upon delivery with the Selling agencies billing office).

4. Coordinate with the other Federal Agency, and prepare the IGO using the Interagency Agreement (IA) form in IDEAS, Form 1681-3, and the IGO Articles. The Articles and Form 1681-3 are available in IDEAS as a template under the menu Procurement>Attachments.

TABLE 1 identifies the mandatory data fields to be completed on the IA form in IDEAS:

TABLE 1 IDEAS INTERAGENCY AGREEMENT FORM DATA ELEMENTS TO BE COMPLETED	
FORM/BLOCK/ITEM NO.	DESCRIPTION
Block 3	Date Prepared
Block 4	Agreement Number
Block 5a.	Modification No. if applicable
Block 6:	To:
Block 7	From
Line Item Summary	All Line Items must be completed with the
	applicable PSC and NAICS code.
Contract-Level Funding	
Block 11	Under the Authority Of
Block 12b	BLM Agency Location Code
Block 13	Mail Invoices To
Block 15a	Authorized Officer of Originating Agency
	(BLM), and Date

5. Numbering IGO's – Refer to IM BC-2002-029, Change 1 - BLM's Document Identification Numbering System (DINS) - The DINS numbering system will be used to assign the obligation document number on the IGO. NOTE: The Obligating document number is the number under which the obligation is made. For BLM the document instrument Code will be the letter "I".

Establishing Master Interagency Agreements (IA) – The establishment of master IA's for the purpose of issuing individual Task Orders shall not be used in the BLM. All requirements must be identified and issued on a specific Inter/IntraAgency Agreement (synonymous with the terms IGO/IGT).

- 6. The servicing Agency (Seller) must be registered on the Business Partner
 Network (BPN) @ http://www.bpn.gov before BLM can enter into the agreement.
 The Servicing Agency must be entered in the IDEAS Vendor Maintenance Table to process the award. Instructions for entering vendors can be obtained from the National Acquisition Website @ http://web.blm.gov/natacq/ideas.
- 7. All IGO's awarded by the BLM must be signed by a warranted CO.
- 8. Form 1681-3 This form may be used as a data collection tool to ensure all the required data elements, per the new OMB Standard Business Rules, are collected

for both the Buyer and the Seller. Contact the National Business Center Finance Office for assistance in completing required data elements. This form may be attached to the IGO as an addendum. If the form is not used, all of the required data elements must be listed in the IGO for both the Buyer and the Seller. Once the Department of Interior (DOI) interface to the Intra-governmental Transaction Portal (IGTP) is developed and implemented the data collected for both the Buyer and Seller will be entered via the Portal. The 1681-3 should be completed electronically and saved as an attachment to your IGO in IDEAS.

The IGO is signed by both the Seller and the Buyer. The Buyer's signature must be a BLM warranted CO. The Seller (Servicing Agency) signature varies but most often is the budget official or Agency Official authorized to commit the agency to perform the service or supply the goods as detailed in the IGO.

- 9. The data provided on form1681-3 and the IGO Articles will be used to administer the IGO and associate the obligating document number with the costs incurred under the Sellers RWA project number (reimbursable account numbers).
- 10. Electronic Commerce All IGO awards and related attachments will be submitted to the DOI Electronic Commerce website.
- 11. Upon notification from Finance, the CO has 10 days to review and confirm with Finance the billing submitted by the Seller (Servicing Agency). During the review, the CO should consult with the program office official to verify that the amount billed is correct and commensurate with the goods or services that were received and to verify that the correct fund code(s) is/are being expensed.

After 10 days from receipt of a bill transmitted via the (IGTP) constructive acceptance will be deemed to occur and the portal will initiate the Intragovernmental Payment and Collection system (IPAC) transfer. IPAC bill transactions automatically and electronically retrieve funds from the agency being billed. Transactions greater than \$100K will be processed via the IGTP. IPAC will be used for transactions less than \$100K.

- 12. Upon receipt of notification from the program office that goods/services have been received, the CO will close the IGO. If unexpended funds remain on the IGO, then the CO must prepare a modification to deobligate the excess funds. The CO should request written verification from the Seller that BLM has been billed in full and verify the final amount of the IGO prior to initiating the closeout action.
- 13. FPDS Reporting –IGO's are not to be reported in the Federal Procurement Data System-Next Generation (FPDS-NG).
- 14. Use of the Government Purchase Card and Convenience Checks The procedures contained in this IM are not applicable to IGO's that are paid using the Government purchase card. When processing and paying for IGO's with the Government purchase card, cardholders may not exceed their single purchase

limit established on their Government charge card account or, if a warranted CO, the single purchase limit established in their CO warrant.

The charge card program convenience checks may not, under any circumstances, be used to make payment for IGO's.

IDEAS Implementation - Implementation of IGO's using the IDEAS program will be on a "Go Forward Basis". Existing IA's and associated Task Orders that were entered into prior to the issuance of this IM that are still active are not required to be entered into IDEAS. However, if the other agency has implemented the OMB business rules then billing and IGO data elements must be furnished accordingly. If existing IA Task Orders are in place and modification is needed, a new IGO should be established

D. Finance Office: Finance Approvals by RDE - A finance approval template - Finance (Interagency Agreements) will be applied to the IGO. A new FFS transaction type (I\$) has been assigned to this approval sheet for tracking IGO's.

<u>Payment Process by Accounts Payable (SOPAC)</u> - Accounts Payable staff is responsible for:

- 1. All Payments are made referencing the obligating document number (IGO Number) assigned by the CO and disbursing charges from the Seller to the appropriate fund code cited in the IGO (refer to the 1681-3 if attached to the IGO. The IGO articles and 1681-3 will be available electronically by using the IDEAS Search feature, searching by the IGO Number (obligating document number) and open the appropriate attachment.)
- 2. Bills that are received from the Seller (Servicing Agency) via IPAC or the IGTP will be immediately coordinated with the responsible CO. The CO will be responsible for submitting receiving information (including the appropriate fund code(s) to be charged) to the Finance Office via email to expedite posting of the IPAC to FFS.
- 3. Payments are made and received according to the terms and conditions of the IGO.

- **II. SELLER (Servicing Agency) Responsibilities** When the BLM is providing goods or services to another Federal Agency, the following procedures will be followed by all Program, Finance, and Budget Office staff. Note: It is the Buyer's (Requesting Agency's) responsibility to initiate the IGO.
 - **A. Program Offices** The Program Office will be responsible for the following when BLM provides goods or services to another agency:

Note: No work will begin by BLM until the IGO is signed by both parties and all required data elements are obtained for both the Buyer and Seller. All costs are to be charged to the appropriate project number assigned at the time the IGO is initiated.

Note: When another agency pays for a BLM employee to travel or gives a BLM employee an award a reimbursable account must be established. Therefore, the Buyer (Requesting Agency) must establish an IGO.

- 1. Coordinate the establishment of a Project Number (Reimbursable Work Agreement) with the appropriate Budget representative.
- 2. Assist the BUYER in developing the IGO Articles (terms and conditions). Note: BLM bills monthly. This term must be conveyed to the Buyer and included in the Buyer's IGO.
- 3. BLM policy requires that an Indirect Cost Rate be assessed on all expenditures associated with an IGO where BLM is providing goods or services to another Federal Agency. The rate for this cost must be identified in the IGO. Consult with your Budget representative to get the current Indirect Cost Rate (an IM is issued annually). If requested, a waiver or a reduction of the Indirect Cost Rate must be approved and signed by the Bureau Budget Officer (WO-800) prior to any commitment by BLM if the Indirect Cost Rate will be waived. (Refer to the Delegation of Authority, BLM Manual Section 1203 (Note: referred to as an administrative surcharge in Section 1203)).
- 4. Provide the required data elements using the form 1681-3 to the Buyer for inclusion in their IGO. Your Budget representative will assist you in completing the required data elements for BLM as the Seller.
 - BLM bills on a monthly basis. The terms established for billing by the Seller must be stated in the IGO. Form 1681-3 is available on the National Acquisition website at http://web.blm.gov/natacq. The data elements collected on Form1681-3 should be completed electronically and emailed to BC612Project@blm.gov.
- 5. Line Managers are authorized to sign the IGO on behalf of the BLM to commit resources in performing work for the Buyer (Requesting Agency).
- 6. Provide a copy of the Buyer's (Requesting Agency's) signed (fully executed) IGO (including the agreement terms and conditions and the corresponding Buyer and Seller data elements) to BC-612 (BLM NBC's Financial Programs and

- Investments Branch). Subsequent modifications to the original IGO must also be forwarded to finance.
- 7. Ensure that all cost associated with performing the service or providing the goods are promptly, and accurately recorded against the assigned RWA project number to ensure that full cost recovery is made.
- 8. Ensure all terms and conditions of the IGO are met and BLM responsibilities are fulfilled.
- 9. Issue a completion report within 10 days after all costs for services or goods have been charged to the project, (Attachment 5 under the issuing IM, subject: Intragovernmental Transactions (IGT)). The completion report must be certified by budget. The completion report is sent to Finance and a copy is provided to the Buyer. The completion report may be sent by email to both parties. The email address for finance is BC612Projects@blm.gov. No costs can be charged to the project after the completion report is sent.
- **B.** Budget Office An authorized budget representative will be responsible for the following:
 - 1. Assist the Line Manager (Program Official) in completing the tasks identified in paragraph A. 1-9 above.
- C. Finance Office Responsibilities (Billing Department)(Financial Programs and Investments Branch BC-612): Data will be required to establish an account in FFS, for entry on IPAC and/or via the IGT Portal to meet the new OMB standard business rules. The Finance Office will be responsible for:
 - 1. Establish a Project Account in the Federal Financial System (FFS) based upon the executed IGO.
 - 2. The Buyer (Requesting Agency) will be billed monthly. No billing shall occur during the last 5 days of any given month.
 - 3. Upon receipt of the Intra-governmental completion report, any available authority will be reduced and the project will be closed in FFS. No additional charges to the Requesting Agency will be allowed.